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TIMOTHY C. DRAPER and DRAPER ASSOCIATES V
CRYPTO LLC

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

This document relates to All Actions.

CLASS ACTION

**UNOPPOSED REQUEST OF
DEFENDANTS TIMOTHY C. DRAPER
AND DRAPER ASSOCIATES V CRYPTO
LLC FOR ENTRY OF ORDER OF
DISMISSAL**

Defendants Timothy Draper and Draper Associates Crypto V LLC (collectively, the “Draper Defendants”) hereby respectfully request that the Court enter an order of dismissal of this consolidated action against them with prejudice. The Draper Defendants moved pursuant to F.R.C.P. Rule 12(b)(6) to dismiss Plaintiff’s claims against them in his Consolidated Complaint. By Order dated August 7, 2018 (Dkt. # 148), the Court granted the Draper Defendants’ motion and gave Plaintiff leave to amend his Complaint within 20 days of issuance of the Order. On August 16, 2018, the parties filed a Stipulation in which Plaintiff notified the Court of his election

1 not to amend his Complaint against the Draper Defendants. (See Dkt. # 156 at p. 1:14-16.)
2 Accordingly, the Draper Defendants hereby respectfully request that the Court enter an order
3 dismissing with prejudice Plaintiff's claims against the Draper Defendants. *See e.g., Edwards v.*
4 *Marin Park, Inc.*, 356 F.3d 1058, 1064 (9th Cir. 2004). Counsel for the Draper Defendants has
5 notified Plaintiff's counsel of this request and Plaintiff's counsel does not oppose the request. A
6 proposed order of dismissal is attached hereto as **Exhibit A**.

7
8 Dated: August 20, 2018

MANATT, PHELPS & PHILLIPS, LLP

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10 By: /s/ Christopher L. Wanger

11 Christopher L. Wanger
12 Attorneys for Defendants TIMOTHY C.
DRAPER and DRAPER ASSOCIATES V
CRYPTO LLC

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EXHIBIT A

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TEZOS SECURITIES LITIGATION

This document relates to All Actions.

Master File No. 17-cv-06779-RS

CLASS ACTION

**[PROPOSED] ORDER OF DISMISSAL OF
DEFENDANTS TIMOTHY C. DRAPER
AND DRAPER ASSOCIATES V CRYPTO
LLC**

Defendants Timothy Draper and Draper Associates Crypto V LLC (collectively, the “Draper Defendants”) moved pursuant to Federal Rule of Civil Procedure 12(b)(6) to dismiss the claims of Lead Plaintiff Arman Anvari (“Plaintiff”) against them in his Consolidated Complaint. By Order dated August 7, 2018 (Dkt. # 148), the Court granted the Draper Defendants’ motion and gave Plaintiff leave to amend his Complaint within 20 days of issuance of the Order. On August 16, 2018, the parties filed a Stipulation in which Plaintiff notified the Court of his election not to amend his Complaint against the Draper Defendants. (See Dkt. # 156 at p. 1:14-16.) Accordingly, the Court hereby dismisses with prejudice Plaintiff’s claims in his Consolidated

Complaint against the Draper Defendants. *See e.g., Edwards v. Marin Park, Inc.*, 356 F.3d 1058, 1064 (9th Cir. 2004).

IT IS SO ORDERED

Dated: August ___, 2018

RICHARD SEEBORG
United States District Court Judge

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